

WORK ASSIGNMENT NO. 2-03  
Technical/Regulatory Support for Subpart W of NESHAPS  
WAM: Rosnick

**PURPOSE AND SCOPE**

Under this Work Assignment (WA), SC&A will provide technical and regulatory support to the EPA Office of Radiation and Indoor Air to develop a potential rulemaking to update the NESHAP Subpart W standard for radon emissions from operating uranium mill tailings impoundments which was promulgated on December 15, 1989 (40 CFR 61.250). Subpart W includes two separate standards. First, existing sources must ensure emissions from tailings impoundments do not exceed 20 pCi/m<sup>2</sup>-sec of radon-222. Second, new sources must comply with the requirements for constructing one of two types of impoundment structures. Subpart W requires that existing sources file an annual report of the facilities' emissions. These sites include the mills regulated by the NRC and its Agreement States.

Section 112(q) of the Clean Air Act, as amended, further requires EPA to review, and if appropriate, revise or update the Subpart W standard on a timely basis (10-year interval). To date, EPA has not revisited this standard since its promulgation and now desires to do so. The purpose of this WA is to provide follow-on contractor support for the development of a draft Background Information Document (BID) to support EPA's rulemaking efforts to determine if modification of Subpart W is warranted.

**TECHNICAL STATUS***Progress Made During Period:*

SC&A was provided a new WA (effective March 27<sup>th</sup>) under the new contract year to continue and develop a final version of the BID for the ongoing review of NESHAP Subpart W. All work effort during the period of August 2011 involved the completion of our effort to totally revise the draft BID sections of the document submitted under prior WA 1-03. Based on EPA's comments and instructions, SC&A totally revised Sections 1-4 inclusive which were submitted for review by the Work Assignment Manager (WAM) on August 23, 2011. The WAM requested that SC&A review EPA's draft preamble to revise the NESHAP to ensure it matched up with a new Section 5 of the BID. SC&A completed that action in late August to be submitted to the WAM (it was submitted on September 2nd). SC&A has had frequent communication with the WAM and has prepared and submitted monthly reports and statements.

*Difficulties Encountered and Remedial Action Taken:*

None

*Anticipated Activity Next Period:*

SC&A received EPA's comments in response to the first four sections on September 1st and expects to complete their resolution within the month. As indicated, SC&A has completed its revision of Section 5 which was submitted on September 2, 2011. We expect responses from EPA shortly and will complete resolution of those comments within the month. The remaining

WORK ASSIGNMENT NO. 2-03 (continued)  
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section of the combined BID/EIA document is handled under a separate WA (2-04). SC&A expects to complete Sections 1-5 inclusive of the BID prior to September 30, 2011.

*Schedule of Deliverables Next Period:*

SC&A will submit the final BID by September 30, 2011.

**OUTSTANDING ACTIONS AWAITING CONTRACTING OFFICER AUTHORIZATION**

None

**WORK ASSIGNMENT NO. 2-03 (Continued)**  
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<b>OVERALL FINANCIAL INFORMATION</b>				
	<u>Current</u>		<u>Cumulative</u>	
	<u>Hours</u>	<u>Amount</u>	<u>Hours</u>	<u>Amount</u>
Amount Claimed	20.0	2,859.75	267.0	\$34,575.80
Amount Shown on Work Plan			354.0	\$44,340.00
Amount Paid				\$21,091.81
Amount Suspended				\$0.00
Amount Disallowed				\$0.00
Remaining Amount			87.0	\$9,764.20
Unbilled Allowable Costs		\$0.00		\$0.00
Labor Estimates for Next Period			30.0	\$3,700.00
Estimate to Complete			87.0	\$9,764.20
Estimated Percentage of Completion, based on LOE				75%

<b>LABOR SUMMARY</b>									
		<u>Current</u>		<u>Cumulative</u>		<u>Negotiated (Work Plan)</u>		<u>Remaining</u>	
		<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>
P4	SC&A	19.00	2,725.14	260.00	32,689.03	342.00	41,997.00	82.00	9,307.97
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P3	SC&A	1.00	101.56	7.00	710.91	12.00	1,218.00	5.00	507.09
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P2	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Technician	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clerical	SC&A	0.00	0.00	19.50	1,091.63	16.00	1,012.00	(3.50)	(79.63)
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		20.00	2,826.70	267.00	34,491.57	354.00	44,227.00	87.00	9,735.43
<b>Average Hourly Rate (Labor)</b>					<b>\$129.18</b>	<b>\$124.94</b>			

**WORK ASSIGNMENT NO. 2-03 (Continued)**  
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<b>ODC DETAIL INFORMATION</b>		
Item	Current	Cumulative
Publications/Subscriptions	\$0.00	\$0.00
Computer Supplies/Usage	\$0.00	\$0.00
Meetings/Travel	\$0.00	\$0.00
Supplies/Materials	\$0.00	\$0.00
Reproduction/Graphics	\$0.00	\$20.79
Telephone/Fax	\$29.11	\$29.11
Typing/Clerical	\$0.00	\$0.00
Postage/Delivery	\$0.00	\$24.25
Other	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$29.11</b>	<b>\$74.15</b>
Sub ODCs	-	-
Burden on ODCs (including Sub ODCs)	\$3.94	\$10.08

<b>WORK HOUR DETAIL THIS PERIOD</b>		
	<b>Name</b>	<b>Hours</b>
P-4 Labor	A. Zeitoun	4
	L. Skoski	3
	H. Pettengill	12
P-3 Labor	L. Loomis	1
P-2 Labor	None	-
P-1 Labor	None	-
Technician Labor	None	-
Clerical Labor	Clerical	7